

**Tennessee Department of Environment and Conservation
Recreation Educational Services Division
Greenways and Trails Program
ADA Accessibility Guidelines**

All pedestrian trail projects are required to be planned/designed to comply with the “American Standard Specifications for making Buildings and Facilities Accessible to, and Usable by, the Physically Handicapped.” New federal regulations will affect everyone (public and private) who plans and designs trails. The following statements are compiled from the 1999 Final Report noted below and the Final Report should be consulted for exact standards when developing any pedestrian trail. *Trail guidelines are not as rigid as the guidelines for urban buildings and parking lots.*

The Final Report of the Regulatory Negotiation Committee on Accessibility Guidelines for Outdoor Developed Areas (1999) proposes ADA Accessibility Guidelines (**ADAAG**) for *trails, outdoor recreational access routes, beach access routes, and picnic and camping facilities*. The 1999 Final Report is available at: <http://www.access-board.gov/outdoor/outdoor-rec-rpt.htm> .

The following questions and answers cover the highlights of the trail guidelines:

What exactly is a trail according to ADA regulations?

A trail is “*a route that is designed, designated, or constructed for recreational pedestrian use or provided as a pedestrian alternative to vehicular routes within a transportation system*”.

What kinds of trails are subject to the ADA regulations?

The accessibility guidelines apply to those trails that are designed and constructed for pedestrian use. These guidelines are not applicable to trails primarily designed and constructed for recreational use by equestrians, mountain bicyclists, snowmobile users, or off-highway vehicle users, even if pedestrians may occasionally use the same trails. However, a multi-use trail specifically designed and designated for hiking and bicycling would be considered a pedestrian trail.

What if building a trail to an accessible standard just isn't logical, or desirable, or even possible?

The following four areas highlight potential conditional departures from the ADA guidelines that are permitted for any portion of the trail where compliance would:

1. *cause substantial harm to cultural, historic, religious, or significant natural features or characteristics;*
2. *substantially alter the nature of the setting or the purpose;*
3. *require construction methods or materials that are prohibited by Federal, State, or local regulations or statutes;*
4. *not be feasible due to terrain (excessive slope or cross slope) or the prevailing construction practices.*

Please refer to pp. 8-11 in the Final Report of the Regulatory Negotiation Committee on Accessibility Guidelines for Outdoor Developed Areas (1999) for more information.

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Does that mean an urban bikeway is a “pedestrian trail”?

Accessibility guidelines apply to the trails used as non-motorized transportation facilities for bicyclist and skaters as well as pedestrians. *However, the American Association of State Highway and Transportation Officials (AASHTO) Guide (1999), generally required to be used for SAFTEA-LU (new TEA-21) funded projects, requires a greater level of accessibility than the ADA trail guidelines.*

The AASHTO Guide for the Development of Bicycle Facilities is the primary guidebook for facilities built with transportation funds. The AASHTO Guide generally provides a higher degree of accessibility than the ADA trail guidelines (except running slope). The appendix of the Access Board report compares the AASHTO guide with the ADA trail guidelines.

Will we have to bring existing trails up to ADA standards?

No. The proposed accessibility guidelines *require all newly constructed and altered portions of existing trails connected to accessible trails or designated trailheads to comply.*

Must we improve accessibility when trail maintenance is done?

Routine or periodic maintenance or repair of existing trails or trail segments is exempt. Maintenance and repair are defined as work that is not an alternation: it does not change the original propose, intent or design of the trail.

Can we be required to allow vehicles on our non-motorized trails to accommodate accessibility?

No. While a variety of electric powered mobility enhancing equipment can be used on pedestrian or multi-use trails, the necessity of protecting the environment and maintaining the appropriateness of the setting would exclude gas powered ATV's or other off highway vehicles.

Does an accessible trail have to be paved?

Not as long as the surface is “firm and stable”. Asphalt pavement and concrete trails generally come to mind when thinking about ADA accessible trails. However, packed crushed stone, gravel fines compacted with a roller, packed soil and other natural materials bonded with synthetic materials can provide the required degree of stability and firmness.

What about new trails that are nowhere near a road or an accessible trailhead?

The requirements apply only to trails that “connect to an accessible trail” or “designated trailhead”. Where new trails connect to an existing trail that is not accessible, the technical provisions do not apply. Nor do they apply where the new or altered portion is not connected to a designated trailhead.

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KEY REQUIREMENTS FOR AN ACCESSIBLE TRAIL
(A lower standard, or exception, is allowed under certain conditions as noted.)

| | |
|---------------------------------------|---|
| Clear tread width: | 36" (exception: 32") |
| Openings: | 1/2" maximum width (exception: 3/4") on bridge abutments and boardwalks |
| Tread obstacles: | 2" high maximum |
| Exceptions to tread obstacles: | <ul style="list-style-type: none"> • 3" high where running slope and cross slope are 5% or less • 1" high where running slope and cross slope are greater than 5% |

RUNNING SLOPE (TRAIL GRADE UP OR DOWN):

| MAX RUN OF TRAIL SLOPE | MAX DISTANCE between level landings |
|----------------------------|---|
| 0-5% See Figure 1 | Any Distance (see note 1) See Figure 2 |
| 6-8% See Figure 1 | 50 feet of run (see note 2) See Figure 2 |
| 9-10% See Figure 1 | 30 feet of run (see note 2) See Figure 2 |
| 11-14% See Figure 1 | 5 feet of run (see note 2) See Figure 2 |

NOTE 1: Running slope greater than 5% not permitted where cross slope exceeds 5%!

NOTE 2: Level landings 5 feet long are required at the end of each run section.

CROSS SLOPE

| MAX CROSS SLOPE | MAX DISTANCE | |
|-------------------------|---------------------|-------------------|
| 0-2% recommended | Any distance | |
| 3-5% | Any distance | See note 3 |
| 6-8% | 10' | See note 4 |
| 10-12% | 5' | See note 4 |

NOTE 3: Cross slope greater than 5% not permitted where running slope exceeds 5%!!

NOTE 4: Level area 5 feet long is required at the end of each run section.

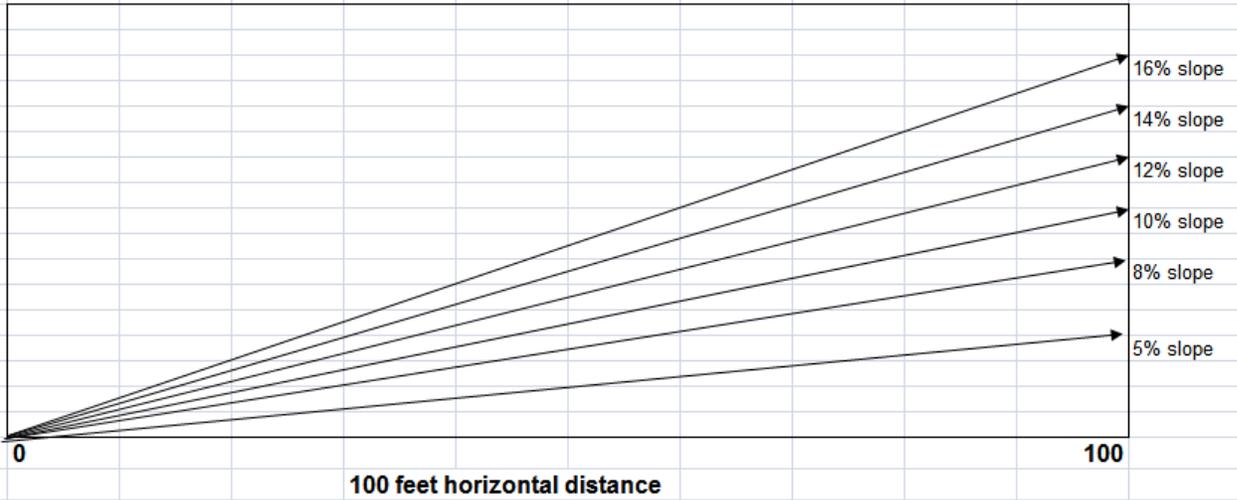
See the following pictures of examples of accessible trail and trailhead facilities on the next pages.

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ADA Accessibility Notes

Figure 1

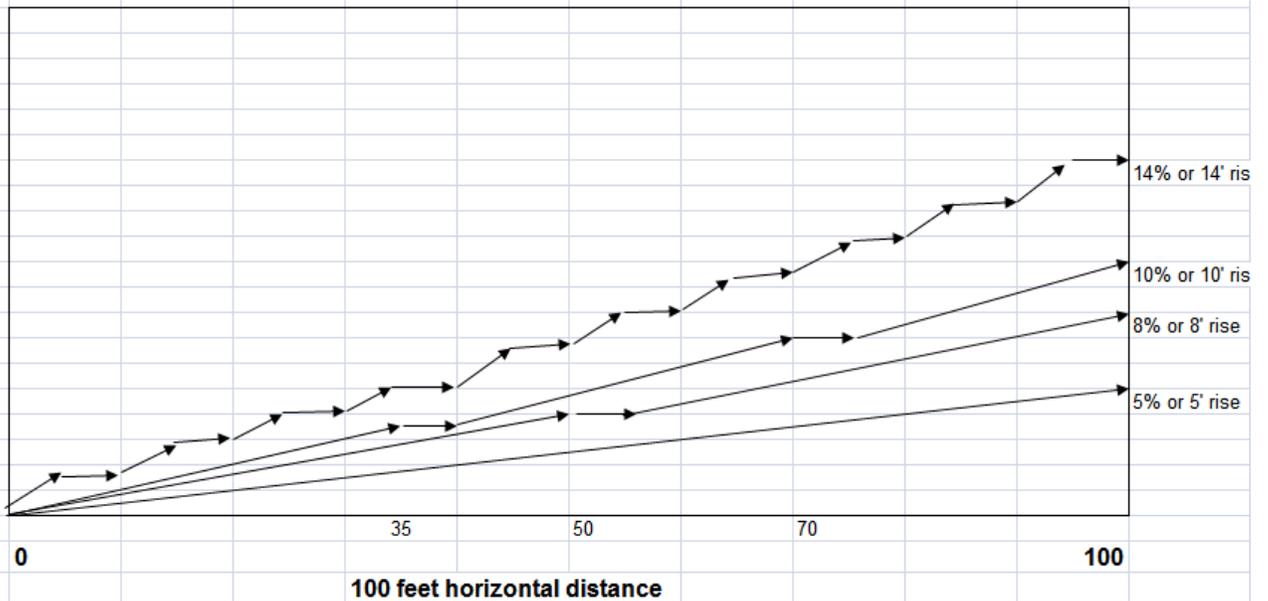
Trail Slope with different percent slopes



ADA Accessibility Notes

Figure 2

Trail Slope with level intervals



**Greenways and Trails Program
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**ADA Accessible parking space with sign at the
Rock Creek Trailhead on the Cumberland Trail**

**Greenways and Trails Program
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**ADA Accessible parking space with sign
Note: parking space is at the same elevation as the sidewalk**

**Greenways and Trails Program
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**ADA Accessible Portable Toilet
See prior picture for sidewalk access**

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ADA Accessible Picnic Table with connecting path to parking area

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ADA Accessible picnic table and trash can adjacent to the trail

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ADA Accessible trail with gravel base and tar and chip surface

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Hard packed natural surface hiking trail

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ADDITIONAL RESOURCES:

For detailed information on accessible trails, the new ADA regulations, and how they apply to specific situations, see the American Trails website: www.americantrails.org/. Click on the “Resources and library” icon, then click on “Accessible trails and ADA.

The AASHTO Guide is available from AASHTO by calling 202-624-5800 or 800-231-3475, or <https://bookstore.transportation.org/> and the Guide generally provides a greater level of accessibilities than the ADA trail guidelines (except for running slope).

The following manuals and guidelines are recommended for trail design, construction and maintenance. Copies may be purchased or acquired from the sources indicated. U.S. Government regulations may be purchased from the U.S. Government Printing Office, Superintendent of Documents, Mail Stop SSOP, Washington, D.C. 20402-9328.

Americans with Disabilities Act (ADA) Accessibility Guidelines for Buildings and Facilities (ADAAG); available in U.S. DOT regulations, 49 CFR Part 37. Also, an *Interim Final Rule* was published in the *Federal Register*, June 20, 1994 (59 FR 31676; 31745); from: U.S. Architectural and Transportation Barriers Compliance Board (Access Board), 1331 F Street NW, Suite 1000, Washington, DC 20004-1111. The *Interim Final Rule* included Section 14, "Public Rights of Way," much of which would be applicable to the Trails Program, if adopted by the U.S. DOT. FHWA intends to develop program guidance for accommodating people with disabilities largely based on Section 14.

Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance; available in U.S. DOT regulations, 49 CFR Part 27 (44 FR 31442). This implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) as amended, to the end that no otherwise qualified handicapped individual in the United States shall, solely by reason of his or her handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Nondiscrimination on the Basis of Disability in State and Local Government Services; available in U.S. Department of Justice regulations, 28 CFR Part 35 (56 FR 35694). This implements subtitle A of title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12131), which prohibits discrimination on the basis of disability by public entities.

Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities; available in U.S. Department of Justice regulations, 28 CFR Part 36 (56 FR 35544). This implements title III of the Americans with Disabilities Act of 1990 (42 U.S.C. 12181), which prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with the accessibility standards established by this part.

Uniform Federal Accessibility Standards, published in the *Federal Register*, August 7, 1984 (49 FR 31528); from the U.S. Architectural and Transportation Barriers Compliance Board (Access Board), 1331 F Street NW, Suite 1000, Washington, DC 20004- 1111.

Recommendations for Accessibility Guidelines: Recreational Facilities and Outdoor Developed Areas, July 1994, a report to the U.S. Architectural and Transportation Barriers Compliance Board by the Recreation Access Advisory Committee, from: Access Board, Recreation Report, 1331 F Street NW, Suite 1000, Washington, DC 20004- 1111. The Access Board is currently developing proposed guidelines for recreation facilities.

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Disclaimer: These guidelines are NOT technical specifications and were compiled as an aid to help understand ADA Accessibility issues. You should refer to the 1999 Final Report of the Regulations Negotiation Committee for more information. The 1999 Final Report is available at: <http://www.access-board.gov/outdoor/outdoor-rec-rpt.htm> . You should also call 1-800-872-2253 for additional information and clarification of these issues.

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